

1 JONATHAN DAVID FRANK SBN89384
160 Thorn Street Suite 2
2 San Diego, CA 92103
(858) 722-2100
3

4 Attorney for Material Witnesses
5
6
7

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 Hon. LOUISA PORTER

11 UNITED STATES OF AMERICA,) Case No. 08CR0212JLS
12 Plaintiff,) Mag. No. 08MJ8417
13 v.)
14 BENNY LOPEZ,) NOTICE OF HEARING ON
15 JUAN JOSE AGUIRRE-CRUZ) MOTION FOR VIDEOTAPE
16 Defendants.) DEPOSITION AND SUBSEQUENT
) VOLUNTARY DEPARTURE OF
) MATERIAL WITNESS
) DATE: June 26, 2008
) TIME: 2:30 P. M.
) DEPT: PORTER
17

18 TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

19 PLEASE TAKE NOTICE that on June 26, 2008 at the UNITED STATES
20 DISTRICT COURT located at 940 Front Street, San Diego, CA 92101
21 before the above-named Judge at 2:30 P. M. or as soon thereafter as
22 the matter may be heard, the material witnesses ISAIAS GUERRERO-
23 MALDONADO, FRANCISCO SORIA-OROZCO, MARCO HERNANDEZ-QUIROZ, PEDRO
24 GAMBOA-OCANA and ARTURO ANDRADE-PEREZ will move the Court for an
25 Order that they be subjected to a videotape deposition prior to
26 trial and subsequent voluntary departure.

27 This motion will be based on 18 U.S.C. 3144 in that the
28 witnesses' testimony can be adequately secured by deposition and

1 further detention is not necessary to prevent a failure of justice.

2 This motion is further based on this notice of motion, the
3 memorandum of points and authorities and declarations filed
4 herewith, and as such other and further evidence as may be
5 presented at the hearing of the motion.

6 Respectfully submitted,

7

8 DATED: June 16, 2008

9

10

/s/
11 JONATHAN DAVID FRANK,
Attorney for Material Witnesses

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28